1	SUPERIOR COURT OF THE STATE	OF CALIFORNIA	
2	FOR THE COUNTY OF LOS	ANGELES	
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4	DAVMOND CADIITNI		
5	RAYMOND GARVIN, Plaintiff,))	
6)))	
7	VS.) Case No.: BC694158	
8	CITY OF LOS ANGELES; and DOES 1 through 100, Inclusive,)	
9	Defendants.))	
10)	
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14	DEPOSITION OF SERGEANT DEANA STARK		
15	TARZANA, CALIFORNIA		
16	THURSDAY, JUNE 27, 2019		
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24	Reported by: Jinna Grace Kim, CSR No.	. 14151	
25	Job No.: 248883		

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         RAYMOND GARVIN,
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                    VS.
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         CITY OF LOS ANGELES; and DOES 1
         through 100, Inclusive,
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9
                    Defendants.
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              The deposition of SERGEANT DEANA STARK, taken on
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    behalf of the Plaintiff, at 18801 Ventura Boulevard, Suite
     208, Tarzana, California 91356, beginning at 10:03 a.m., and
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     ending at 11:32 a.m., on Thursday, June 27, 2019, before
17
18
    Jinna Grace Kim, Certified Stenographic Shorthand Reporter
19
    No. 14151.
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1	TARZANA, CALIFORNIA	
2	THURSDAY, JUNE 27, 2019	
3	10:03 A.M.	
4	DEANA STARK,	
5	called as a witness on behalf of the Plaintiff, having been	
6	first duly sworn, was examined and testified as follows:	
7	EXAMINATION	
8	BY MR. SALUTE:	
9	Q. Good morning.	
10	A. Good morning.	
11	Q. My name is Kevin Salute. I'm an attorney. I	
12	represent Ray Garvin in a lawsuit that he filed against the	
13	City of Los Angeles, and we're here today for your	
14	deposition.	
15	The person sitting to your right is a court	
16	reporter. She's going to take down everything that's said by	
17	you, me, or anybody else during the course of today's	
18	proceeding. At the conclusion of the deposition, she's going	
19	to prepare a transcript. It's going to look like a booklet.	
20	It will be question-and-answer form. You'll have the	
21	opportunity to read, review, and sign it under penalty of	
22	perjury.	
23	Do you understand that?	
24	A. Yes.	
25	Q. The oath that she's given or administered to you is	

- 1 the same oath that's given in a court of law, carries the
- 2 same solemnity as if you were in a court of law even though
- 3 we're in an informal setting.
- 4 Do you know understand that?
- 5 A. Yes, I do.
- 6 Q. I may ask you for certain information like a date or
- 7 time of something that may have occurred. You may not recall
- 8 or it may be even a conversation that may have occurred. You
- 9 may not recall the specific details of that, but I'm entitled
- 10 to your best recollection. However, I don't want you to
- 11 quess.
- 12 And the difference between a guess -- I'm not sure,
- 13 you know, many people get that confused, but the classic
- 14 example that everybody gives is if you were, you know, to
- 15 estimate the conference table sitting in front of you, you
- 16 would be able to do that, but you wouldn't be able to
- 17 estimate the desk in my office because you've never been in
- 18 my office.
- 19 A. Correct. I understand.
- 20 Q. So I'm just here to get your personal knowledge.
- I'm not here to have you speculate, and so if I ask
- 22 you something, and it may require you to speculate, please
- 23 let me know because I'm not interested in speculation.
- 24 Okay?
- 25 A. I understand.

- 1 Q. And if I ask a question, and you don't understand
- 2 the question, please let me know. I'll try to rephrase it to
- 3 as best I can so that you do understand it, and so that you
- 4 can answer the question.
- 5 Okay?
- 6 A. Yes.
- 7 Q. If you do answer a question, I'm going to assume
- 8 that you did understand the question.
- 9 Okay?
- 10 A. Yes.
- 11 O. Let's see. What else.
- The other thing is you're doing a good job of this.
- 13 You're waiting for me to finish my question before you
- 14 answer. I appreciate that. Again, if you picture the
- 15 booklet, it's going to be question, answer, and if we talk
- over each other, it's going to be question, then something
- 17 you said, and then something I said, and then it's not going
- 18 to be very clear.
- 19 Okay?
- 20 A. Yes.
- Q. And the last thing I'll just say this, and again,
- 22 you're doing a good job of it. The court reporter can't
- 23 really take down nods of the head, shakes of the head,
- 24 "uh-huh," "huh-uh," because although I'm sitting in front of
- 25 you, I may understand what you mean. When we go back and

- 1 look at the transcript, it's not going to be clear.
- 2 So when you do answer please answer something
- 3 audibly and something substantive in nature.
- 4 Okay?
- 5 A. I understand.
- 6 Q. All right. Is there any reason you cannot give --
- 7 proceed with the deposition today?
- 8 A. No.
- 9 Q. Is there any reason you cannot give your best
- 10 testimony today?
- 11 A. No.
- 12 Q. Can you state your full name and spell it for the
- 13 record.
- 14 A. Deana Stark, D-e-a-n-a, S-t-a-r-k.
- 15 Q. All right. And what is -- you're currently employed
- 16 by the City of Los Angeles?
- 17 A. Yes.
- 18 Q. By the Los Angeles Police Department?
- 19 A. Yes.
- 20 Q. And what is your current rank and assignment?
- 21 A. I'm currently assigned as a Sergeant II for
- 22 Emergency Services Division Bomb K9 Unit.
- Q. And how long have you held that position?
- A. Approximately three and a half years.
- 25 O. So you came into that unit at approximately 2015?

- 1 A. Correct. October of 2015.
- 2 Q. And at that time was Ray Garvin the Lieutenant
- 3 Officer in charge of the unit?
- 4 A. Yes.
- 5 Q. And was there a another Sergeant II at that time?
- 6 A. Yes.
- 7 Q. And was that Randy Goens?
- 8 A. Yes.
- 9 Q. When you came into the unit, did you supervise a
- 10 particular watch?
- 11 A. Yes.
- 12 Q. What watch did you supervise?
- 13 A. Day Watch.
- Q. And Day Watch, what are the -- what were the
- 15 hours?
- 16 A. 05 -- 5 o'clock in the morning to 1500 which would
- 17 be 3:00 p.m.
- 18 O. And at that time did the officers work 4-10's, or
- 19 what was the regular schedule for handlers?
- 20 A. The officers worked 4-10, yes. Correct.
- Q. And what about you, what were you working back when
- 22 you started at the Bomb K9 Unit?
- 23 A. Initially, what they referred to as the 9-17 was
- 24 what the shift was when I first got there, and it later
- 25 changed to the 4-10.

- 1 0. What is 9-17?
- 2 A. It's a few days more that you work. They're
- 3 nine-hour days as opposed to ten-hour days. So there is a
- 4 couple of extra days that you would normally have off for the
- 5 4-10 that you don't with a 9-17.
- 6 Q. So does 17 refer to the number of days you worked in
- 7 a month?
- 8 A. I'm actually not sure, and I think it's also been
- 9 referred as to as the 9-80. I know it equates to working two
- 10 more days as opposed to the 4-10 schedule.
- 11 Q. Do you know when it changed from the 9-17 schedule
- 12 to the 4-10 schedule?
- 13 A. I don't recall specifically the actual date or
- 14 month, but I want to say it was probably in early 2016.
- 15 It wasn't too long after I got there. Maybe --
- 16 maybe somewhere between March and the end of summer.
- 17 I can't remember specifically.
- 18 O. Okay. Was Garvin still the OIC at that time?
- 19 A. Yes.
- 20 Q. After it changed to the 4-10 schedule, did it change
- 21 again, or it stayed that way through today?
- 22 A. It's the same. It has not changed.
- Q. So basically you worked the 9-17 schedule for --
- 24 it's like maybe about six months or so?
- 25 A. Probably. I don't know for sure the time, but.

- 1 Q. Okay. That sound about right, though?
- 2 A. About, yes.
- 3 Q. And when you were -- do you still work the day
- 4 schedule, Day Watch --
- 5 A. No.
- 6 Q. When did that change?
- 7 A. When we went to the 4-10 schedule, if there was only
- 8 one supervisor to -- that was working for the day between
- 9 myself and Lieutenant Garvin or Randy Goens, then we had
- 10 agreed that we would work kind of a mid shift to captain both
- 11 watches so that there was at least a supervisor covering both
- 12 watches.
- So probably -- I probably worked the Day Watch
- 14 mostly, specifically, until the first year, probably the
- 15 first year I was there. And then we started doing more mid
- 16 days which is what I'm currently on now.
- 17 Q. Okay. So mid day would be more of like a 11 --
- 18 A. Around -- yeah. I mean, it varies, but usually
- 19 around 10 to 8, 10:00 a.m. to 8:00 p.m. shift is what I
- 20 generally work.
- 21 O. And what about the handlers, did they still work
- 22 the -- are they still on a Day Watch, Night Watch schedule?
- 23 A. Yes. They have the same exact schedule that they
- 24 always had.
- 25 O. And when you started at Bomb K9 Unit, who were the

- 1 officers that -- well, were there officers that primarily
- worked Day Watch?
- 3 A. Yes.
- 4 Q. How many officers did you supervise on the Day Watch
- 5 schedule?
- 6 A. Approximately seven.
- 7 Q. And who were those?
- 8 A. Melhog was the trainer at the time for a few months,
- 9 John Long, John Borquez, Laurie Harrington, Eric Young, I
- 10 think Leslie Salinas and Ara Hollenbeck. I think that was it
- 11 primarily. There was some adjustments if people wanted to
- 12 bump someone to another watch, you know, for a few months,
- 13 but I think basically that was mostly the Day Watch.
- 14 Q. Is it fair to say that there were some officers that
- 15 preferred to work Day Watch as opposed to working Night
- 16 Watch?
- 17 A. Yes.
- 18 O. Now, when Ray Garvin was the officer in charge of
- 19 the Bomb K9 Unit, do you know what hours he did -- well, did
- 20 he have certain hours that he normally would be working?
- 21 A. He normally worked a Day Watch, but it would vary.
- 22 He normally worked probably a 7 o'clock start time, but it
- 23 varied from time to time, so around a 7 o'clock start time is
- 24 what he usually worked. There were times he would be there
- 25 at 5 o'clock for roll call also. So it just depended.

- 1 Q. Is that when there was some special training event
- 2 or something that was happening that day or just kind of
- 3 random, if you know?
- 4 A. No. I think it just depended on what he had
- 5 going.
- 6 Q. So if he would -- if -- when he would do a 7 a.m.
- 7 start time he would finish around 4:00, 5:00?
- 8 A. Yes. On the 4-10 it would be 5:00 o'clock p.m.
- 9 On the 9-17 he would have finished at 4:00
- 10 o'clock.
- 11 Q. And were there particular days that he normally
- 12 worked?
- 13 A. Mostly during the week and occasionally some weekend
- 14 days.
- 15 O. Would you, Goens, and Garvin, discuss the scheduling
- 16 for upcoming deployments or DP's so that you guys can make
- 17 sure that there was supervisory coverage for the upcoming
- 18 DP's?
- 19 A. Well, we always made sure that there was a
- 20 supervisor working. The three of us we always made sure that
- 21 there was one of us there every day to make sure that we had
- 22 some supervisory coverage.
- Q. Was that something that Garvin had instituted, or
- 24 was that something that -- or you don't know where it came
- 25 from?

- 1 A. I don't know where it came. It was just in practice
- 2 when I was there, when I started.
- 3 Q. But the general practice through the time that he
- 4 left Bomb K9 Unit was that he would make sure that there was
- 5 some supervisory coverage either he was there or one of the
- 6 sergeants was there?
- 7 A. Yes.
- 8 O. Did you ever supervise Mark Sauvao?
- 9 A. Yes.
- 10 Q. When did you supervise Sauvao?
- 11 A. He had changed his hours occasionally to work a Mid
- 12 Watch, also. So there were occasions where he would come in
- 13 earlier from the p.m. watch when I was mostly Day Watch. And
- 14 then after about a year I went to a p.m. watch, and so I
- worked with him a few times, but then he switched to Day
- 16 Watch. So I've supervised him, but not for extended periods
- 17 of time.
- 18 O. Did you ever prepare any performance evaluations for
- 19 him?
- 20 A. Yes.
- 21 O. Do you know how many?
- 22 A. No. Not offhand.
- Q. Was it -- is it fair to say that Goens was his
- 24 primary supervisor?
- 25 A. Yes. When I first got there, yes.

1 0. Now, at the time that you came on board to the Bomb 2 K9 Unit, who was the captain? 3 Do you recall? 4 Α. Yes. 5 Who was it? 0. It was Roland Solano when I first got hired there. 6 Α. 7 0. And do you recall how long he was captain for? 8 Α. I want to say till about February or so of 2016. 9 And then new captain came in? 0. 10 Α. Yes. 11 And that was Captain Kathy Meek? 0. 12 Α. Yes. 13 And after Captain Meek came in, was there any kind Q. 14 of a, like, a command staff kind of briefing where she 15 brought supervisors in to discuss what her expectations were, that kind of thing? 16 17 Α. No. Here's what I'm trying to get at. 18 0. Many times when there is a transition in leadership, 19 20 the new captain or the new lieutenant or whoever it is has 21 some sort of, like, a transitional meeting to kind of brief 22 everybody on, you know, hey, I'm the new captain, kind of 23 thing. She didn't do anything like that? 24 25 Α. No.

- 1 Q. Was there any kind of a unit meeting with Captain
- 2 Meek shortly after she took over as captain?
- 3 A. No. Not that I recall.
- Q. Did you ever have any meetings with Captain Meek
- 5 individually after she took over?
- 6 A. In relation to her expectations?
- 7 Q. No. Just in general.
- 8 A. Yes. In general, there were some meetings.
- 9 Q. Well, did she ever -- maybe I'm -- maybe I wasn't
- 10 clear about what I was asking earlier.
- Were you ever present when Captain Meek held any
- 12 kind of a unit meeting after she became the captain, meaning,
- 13 a unit meeting with the Bomb K9 Unit?
- 14 A. She had attended some unit meetings on occasion in
- 15 general for when we had, like, a training day, and we had
- 16 everybody together. She had been present in a couple of
- 17 those.
- 18 O. Did she address anybody, like address the unit?
- 19 A. No. I mean, there was, I think she had addressed
- 20 some things pertaining to some of the changes we were
- 21 going to make at one point regarding, like, training
- 22 notifications and so forth.
- But mostly, she never really addressed the unit
- 24 about anything specific.
- 0. Okay. Do you recall what -- what was discussed

- 1 about the changes?
- 2 A. Not offhand. I know that we made a change to -- at
- 3 her direction, on notifying for training. So that was
- 4 discussed, I believe, at one of them. Just the new
- 5 procedures that she had outlined in place which they had
- 6 received an e-mail as well from us.
- 7 Q. Okay. How did you become aware that Captain Meek
- 8 was going to be the new captain of overseeing Bomb K9 Unit?
- 9 A. I don't recall specifically. I think I just heard
- 10 it like a rumor, that, you know, that she was replacing
- 11 Captain Solano.
- 12 Q. Had you ever worked previously with Captain Meek?
- 13 A. Not worked with her. I know that she worked at a
- 14 division I had been at before, but I don't think we were
- 15 there at the same exact time. I can't remember because there
- 16 was a time she worked as a supervisor, maybe, in the training
- 17 part of Southeast, but I don't recall us actually being there
- 18 at the same exact time.
- 19 O. After Captain Meek was transferred in, became the
- 20 captain of Bomb K9 Unit, did she ever come to talk to you
- 21 about any concerns that you may have had regarding Ray
- 22 Garvin?
- 23 A. Yes.
- O. Do you recall when that was?
- 25 A. Not specific dates. It would have probably been

- 1 within the first, probably from February to -- of 2016,
- 2 somewhere through that year, but I don't recall the exact
- 3 months.
- 4 Q. Was that like an in-person kind of a thing?
- 5 A. Yes. She would stop by periodically down at the
- 6 office.
- 7 Q. Unannounced?
- 8 A. Yes.
- 9 Q. On one of those occasions she met with you?
- 10 A. Yes.
- 11 Q. And did she tell you what the purpose for the
- 12 meeting was?
- 13 A. No.
- Q. Do you recall what was discussed with her?
- 15 A. In general, sometimes she would just ask how are
- 16 things going. And occasionally, she may inquire, you know,
- about something specific that she had heard and ask, you
- 18 know, my view on it or my information on it.
- 19 Just in general she would stop by.
- 20 Q. Do you recall anything that she asked you about?
- 21 MR. KONG: Objection. Vague as to time.
- Go ahead.
- THE WITNESS: I mean, there were different subjects.
- 24 You know, occasionally, she would ask if she had heard some
- 25 things about Lieutenant Garvin and wanted my view if I had

- 1 been there or heard some of the same things.
- 2 BY MR. SALUTE:
- 3 Q. Do you recall anything she asked you about that she
- 4 supposedly had heard about Garvin?
- 5 A. She had asked me at one point -- well, it wasn't
- 6 really that she was asking me. She had just told me that she
- 7 had heard that he had been angry one day and had been
- 8 throwing pens and storming through the halls and cursing.
- 9 Q. Did she tell you where she learned that
- 10 information?
- 11 A. No.
- 12 Q. And this was a conversation that took place at the
- 13 K9 Unit --
- 14 A. K9 --
- 15 O. -- office --
- 16 A. Yes. Correct.
- 17 Q. Was it just you and her talking?
- 18 A. Yes.
- 19 O. Do you remember where in the office this
- 20 conversation took place?
- 21 A. The sergeant's office.
- 22 O. And what did you tell her in regard to her comment,
- 23 if anything?
- 24 A. I told her that I had never seen that, and I had no
- 25 knowledge of any of that occurring.

- 1 Q. Did she say anything in response to your comment?
- 2 A. No. Just that she had heard it, but she didn't tell
- 3 me who, from who.
- 4 O. Other than the comment that she made about Garvin
- 5 being angry, throwing pens, and cursing, did she tell you she
- 6 had heard anything else about Garvin or inquire about any
- 7 other things that she had heard about Garvin?
- 8 That was compound. So let me ask it this way.
- 9 Did -- other than that comment about Garvin being
- 10 angry, throwing pens, and cursing, did she make any other
- 11 comments about anything else that she had heard about
- 12 Garvin's conduct?
- 13 A. Yes.
- 14 Q. What else?
- 15 A. She had relayed at one point that she had heard
- 16 that -- that he wasn't allowing Randy and I to be supervisors
- 17 and do supervisory work. Namely, she was talking about
- 18 reviewing and tracking the recap, the logs, the daily field
- 19 activity reports that the handlers filled out on a daily
- 20 basis.
- 0. Was this a comment she made at the same time as the
- 22 earlier comment you mentioned, or is this at a different
- 23 time?
- 24 A. It was at a different time.
- 25 O. And where did this comment take place?

1 Again, at the office? 2 Α. Yes. 3 In the sergeant's office? 0. 4 Α. Yes. 5 And was it just you and her? Q. 6 Α. Yes. 7 0. Was this around early 2016, again? Yeah. 8 Α. Somewhere within that year from February to 9 probably the end of, maybe, February -- I mean, September, 10 October. I can't recall the exact months. 11 12 0. All right. And did you respond to her in relation 13 to that comment about Garvin not allowing you and Randy to be 14 supervisors? 15 Α. Yes. 16 0. And what did you say to her? I said it wasn't correct; that I didn't have that 17 Α. 18 same view; the admin responsibilities we're able to do, but not having to be dragged down with that every day allows me 19 20 to be out in the field with the handlers which I think is an 21 important thing. 22 So I didn't have the view that he wasn't allowing us 23 to be supervisors by doing the recap. 24 0. Who was doing the recaps? 25 Lieutenant Garvin. Α.

- 1 Q. Is that a time-consuming task?
- 2 A. Yes.
- 3 Q. So it was your view that by Garvin doing the recaps,
- 4 that was freeing you up to be more hands-on with the handlers
- 5 in terms of supervision?
- 6 A. Yes.
- 7 Q. When you say that it's time-consuming, what are we
- 8 talking about?
- 9 Hours? Minutes?
- 10 A. It could, depending on how many days' worth, you
- 11 know, if you stay on top of it and try to do it everyday, but
- 12 sometimes you're waiting for logs to be turned in, but it
- 13 could take a couple hours to do. You meticulously have to go
- 14 through each log and track a variety of things.
- 15 Q. And are these recaps done on a weekly basis?
- 16 On a DP basis?
- 17 A. We try to do them daily, but you know, there are
- 18 times where, you know, like currently now, I'm off. So when
- 19 I come back I might have a weeks' worth to do. I might only
- 20 have two days' worth to do. So it just depends on how
- 21 current you stay on top of it, how often you're able to do
- 22 them.
- Q. And in terms of doing the recaps, was it your
- 24 understanding that Garvin was doing the recaps for both
- 25 officers that you supervised and the officers that Goens

supervised? 1 2 Α. Yes. 3 So basically he was doing it for the entire unit? 0. 4 Α. Yes. 5 But the bottom line is you saw it as a benefit 0. 6 rather than a detriment that he was going it? 7 Α. Yes. 8 0. Other than the two comments that you mentioned, were 9 there any other comments that Meek had made to you regarding 10 Garvin? 11 Α. There were other conversations. I just don't recall everything specifically. There was a comment that was a 12 13 telephone call in regards to a training event that we were 14 putting together to acclimate the K9's helicopters, and we 15 had a bomb tech that had contacts with the fire department 16 and air support arranging that. And so I was working with him to schedule all of that and coordinate dates and so 17 18 forth. And she had called me and told me that she had found out that we were doing it which is not a secret. We normally 19 let them know, but we were still in the planning stages of 20 21 it, and it had already been done prior before I got there, 22 and it had just been done prior for the city teams. But she 23 indicated that we needed to not do that first. We needed to

and that she wanted me to do that beforehand.

do what she called was "Direct Action Team Training" by SWAT;

24

25

- 1 And you know, I had asked why is that necessary, and
- 2 she felt that that should be the training that preceded this,
- 3 and she had indicated that she had heard Garvin made some
- 4 comments to other -- I don't know who was present, if it was
- 5 to other handlers, or when other bomb techs were present in
- 6 roll call, that something to the effect that he'll schedule
- 7 his own training days, like, nobody's going to tell him what
- 8 he can and can't schedule. And I told him I didn't hear
- 9 that, and I was not aware of that occurring.
- 10 So it was just based off of, obviously, some
- 11 information that was coming to her from other people that are
- 12 not -- I don't know who they were.
- Q. And this training event regarding helicopters, do
- 14 you recall when that was in the planning stages?
- 15 A. It probably -- I don't recall the exact month.
- I -- we've had so many training days. I would have
- 17 to look at our training plans to see exactly when that was.
- 18 O. As you sit here today, would it be your best
- 19 estimate that it occurred sometime in early 2016, mid 2016,
- 20 or after that?
- 21 A. It might have even been later 2016, early 2017.
- 0. Okay. So we've got three comments that you recall
- 23 that Captain Meek made regarding Garvin.
- Any other comments that you recall that she had made
- 25 to you or discussed with you regarding Garvin?

- 1 A. Not that I recall specifically.
- Q. Did you hear from anybody within the unit, meaning,
- 3 Bomb K9 Unit, that Captain Meek had talked to them about
- 4 Garvin and his supervision of the unit?
- 5 A. Can you repeat that question again?
- 6 Q. Yeah. Here's what I'm trying to get at.
- 7 I just want to find out whether you became aware
- 8 that Captain Meek had talked to other people within the unit
- 9 about Garvin.
- 10 So my question was: Did anybody tell you that
- 11 Captain Meek had talked to them about Garvin?
- 12 A. Yes.
- 13 Q. Who talked -- who told you that Meek had talked to
- 14 them about Garvin?
- 15 A. Ara Hollenbeck.
- 16 O. Who else?
- 17 A. Eric Young -- that's all I can recall specifically.
- I think just throughout the time that I'd been
- 19 there, there had probably been other conversations, but
- 20 specifically that -- those two.
- 21 O. Okay. And when did you talk to Hollenbeck about
- 22 Meek talking to him about Garvin?
- 23 A. It probably would have been, you know, late 2016,
- 24 early 2017, around that time.
- O. And what did Hollenbeck tell you about that?

- 1 A. He had met with her to discuss some of the issues
- 2 that were going on in the unit pertaining to another handler,
- 3 and as he was trying to discuss that, he just mentioned that
- 4 Captain Meek really just kept asking questions about
- 5 Lieutenant Garvin.
- 6 Q. Did he tell you what types of things she was asking
- 7 about?
- 8 A. I think she was looking for negative things, but I
- 9 don't recall exactly. I think it was more in a general
- 10 sense, if he had any knowledge.
- 11 Q. I don't need to know the exact words if you don't
- 12 recall them, but do you recall as you sit here today as best
- 13 you can what Hollenbeck told you Meek was inquiring about?
- 14 A. Not -- he didn't say specifically.
- 15 He just indicated that, you know, he had been trying
- 16 to talk to her about another matter concerning him, and he
- 17 felt that it was the -- what she was really focusing on is
- 18 trying to get information about Lieutenant Garvin, which was
- 19 not part of his -- what he was trying to address with her.
- 20 Q. But whatever it was, you felt that he was conveying
- 21 to you that Meek was sort of fishing for negative comments
- 22 about Garvin?
- 23 MR. KONG: Objection. Speculation. Foundation.
- 24 You can answer if you know.
- 25 THE WITNESS: I mean, yes. I don't know for sure,

- 1 but you know, but that's -- I think -- I think it was looking
- 2 for some type of negative comments or if there was any
- 3 information that she needed to have.
- 4 BY MR. SALUTE:
- 5 Q. I'm just trying to get to the gist of what
- 6 Hollenbeck was conveying to you.
- 7 Is that kind of what --
- 8 A. Yes. He didn't have specifics. He just said in a
- 9 general sense that she was asking him if he had any
- 10 information about the Lieutenant. I don't know how it was
- 11 phrased. I don't know if she asked specifically about any
- 12 incidents. It seemed that he was relaying that he felt like
- 13 she wanted to know do you have anything to offer me or give
- 14 me about.
- But I don't know the specific -- he didn't say the
- 16 specific actual words that were discussed.
- 17 Q. And did Hollenbeck convey these thoughts to you in
- 18 one conversation? More than one conversation?
- 19 A. Just the one conversation regarding the meeting that
- 20 he had with her.
- 21 O. And where did you guys talk about this?
- 22 A. I don't recall if it was on the phone or if it was
- 23 at the K9 office. I had many conversation with Hollenbeck
- 24 relating to other things going on in the unit. So I don't
- 25 recall specifically where I was or if it was in-person or

- 1 over the phone.
- 2 Q. Fair enough. And then you mentioned that Young --
- 3 Eric Young?
- 4 A. Yes.
- 5 Q. He was another person who had told you that Meek had
- 6 inquired with him about Garvin?
- 7 A. Yes.
- 8 Q. And what do you recall Young telling you about
- 9 that?
- 10 A. He didn't say anything specific either.
- 11 So I don't know the exact conversation that
- occurred, but somewhere in the general sense that she had met
- 13 with him at the airport and had inquired about the
- 14 Lieutenant.
- But I don't know exactly what she had asked him.
- 16 Q. And do you recall where you and Young discussed this
- 17 issue?
- 18 A. Not specifically. Probably would have been at the
- 19 K9 office in the front or in the back.
- 20 Q. All right.
- 21 A. Of the office.
- 22 O. What makes you recall, or how do you recall that
- 23 Hollenbeck and Young had discussed these things with you?
- A. Hollenbeck had told me that initially because he was
- 25 going through a lot of problems within the unit, and so he

- 1 was frustrated with how things were going pertaining to, you
- 2 know, some things going on. And I think he was relaying to
- 3 me that he felt frustrated that as he is trying to discuss
- 4 some of these problems, that the Captain's focus wasn't
- 5 really on that, in his opinion, is what he was relaying to
- 6 me; that it was on Garvin. So with Young, I believe I found
- 7 out later. It wasn't right away. Eric didn't report that to
- 8 me right away when it happened. It was sometime later that
- 9 he had said, well, Captain Meek had come down and asked him
- 10 some question.
- 11 Q. Do you recall how that came up with Young?
- 12 A. It was after the Lieutenant was removed from the
- 13 unit.
- 14 Q. So you guys were talking about that whole thing
- 15 about how or why he was removed?
- 16 A. Yeah. That is some of the questions that had come
- 17 up within the unit by some handlers.
- 18 O. And at that time were you the -- or was Young
- 19 working your watch?
- 20 A. Primarily, he was on Day Watch. There had been a
- 21 few times where he had been bumped to p.m.'s for three DP's.
- 22 So I don't exactly recall if it was -- I believe it was
- 23 during Day Watch when this occurred, not a p.m. watch
- 24 shift.
- 25 O. I want to ask you some things that the City has

- 1 filed a motion for summary judgment in Garvin's case, and
- 2 Captain Meek had submitted a declaration in which she made
- 3 certain statements, and I'm going to ask you about some of
- 4 the statements that she had made.
- 5 Okay?
- 6 A. Okay.
- 7 Q. One of the statements that she said was, "I heard
- 8 from several of Gardin's -- " I'm sorry. Let me restart it.
- 9 "I heard from several of Garvin's subordinates that
- 10 he often used profanity and abusive language while at work
- 11 and bullied his employees."
- 12 Had you ever observed Garvin use any profanity in
- 13 the workplace?
- 14 A. No.
- 15 O. Have you ever observed Garvin using abusive language
- 16 while at work?
- 17 A. No.
- 18 O. Have you ever observed Garvin bullying his
- 19 employees?
- 20 A. No.
- 21 O. Did Garvin ever bully you?
- 22 A. No.
- Q. Did you ever hear from any of the handlers that you
- 24 supervised that Garvin did any of those things?
- 25 A. No.

- 1 O. She also states in the declaration that, "I also
- 2 heard that Garvin was not a visible supervisor."
- In your time working with Garvin, was he a visible
- 4 supervisor?
- 5 A. Yes.
- 6 MR. KONG: Objection. Speculation.
- 7 Go ahead.
- 8 THE WITNESS: Yes. When I was at work he was
- 9 visible.
- 10 BY MR. SALUTE:
- 11 Q. And just so the record is clear, when you're saying
- 12 that he was a visible supervisor, what do you mean by that?
- 13 A. Present at the airport.
- 14 There were some times where he would start his watch
- down at our other facility, our main facility at ESD,
- 16 Emergency Services Division. He would stop off there because
- 17 that's where our admin gets dropped off, picked up. Our
- 18 projects and overtime slips and everything goes down to that
- 19 place. So he would do a lot of runs on his way to work and
- 20 away from work. So he might stop off there first and be gone
- 21 there, but I don't -- he was always there when I was
- 22 working.
- 23 Q. She next states that, "Garvin did not make himself
- 24 available or accessible to his subordinates out in the field
- 25 to lend his supervision, assistance, or quidance, opting to

- 1 remain in the LAX office."
- 2 So the first question to you is: During the time
- 3 that you worked with Garvin, did he make himself available or
- 4 accessible to you?
- 5 A. Yes.
- 6 O. Did he make himself available and accessible to the
- 7 handlers, as far as you know?
- 8 A. Yes.
- 9 Q. Did he make himself -- well, did he ever go out into
- 10 the field to lend his supervision?
- 11 A. Occasionally.
- 12 Q. Did you feel that he should have gone out more?
- 13 A. No.
- Q. Did he offer his assistance to you?
- 15 A. Yes.
- MR. KONG: Objection. Vaque.
- Go ahead.
- 18 MR. SALUTE: Okay. That's a fair objection.
- 19 BY MR. SALUTE:
- 20 Q. Here -- I'm just trying to understand whether you --
- 21 that this statement here, whether you believe is true or not.
- 22 So let me go back over it. Did he -- let me state
- 23 it this way.
- 24 Did he make himself available or accessible to his
- 25 subordinates out in the field to lend his supervision,

- 1 assistance, or guidance?
- 2 A. I believe he was always accessible.
- 3 He was there if that needed -- was he out in the
- 4 field that much? No.
- 5 He was mostly in the office doing the administrative
- 6 work which there is quite a bit of, but occasionally, he
- 7 would go out into the field, but that's what my job and
- 8 Randy's job was, to be out in the field.
- 9 So he wasn't always out there, but I don't think it
- 10 was necessarily that he wasn't available.
- 11 O. Okay. Did you believe that his working in the
- 12 office caused the Bomb Detection K9 Unit to suffer from low
- 13 morale?
- 14 MR. KONG: Objection. Speculation.
- 15 You can answer if you know.
- 16 THE WITNESS: No. I have no idea if that affected
- anybody.
- 18 I never heard that.
- 19 BY MR. SALUTE:
- Q. Did it cause you to suffer from low morale that he
- 21 was not out in the field more?
- 22 A. No.
- Q. Did you hear from anybody within the unit that they
- 24 were suffering from low morale because he was not out in the
- 25 field more?

- 1 A. No.
- Q. During the time that Garvin was in the Bomb K9 Unit
- 3 and you were the Sergeant II, did you ever hear from anybody
- 4 that they suffered from low morale as a result from anything
- 5 that Garvin did or did not do as a supervisor?
- 6 A. Not low morale. I mean, there -- some people had --
- 7 didn't care for some of the things that he did, but I never
- 8 heard of it in the sense of low morale.
- 9 Q. Okay. Who did you hear from that said that they
- 10 didn't care for some of the things that Garvin did?
- 11 A. Laurie Harrington -- I don't recall the specifics.
- 12 I just -- or the specific handlers, and a lot of
- 13 what was relayed was things that had occurred prior to me
- 14 getting there. So it wasn't specifically that it was during
- 15 that time frame, but obviously, there had been a history that
- 16 had lead up to that.
- 17 Q. Let me ask it this way.
- 18 What did Harrington convey to you in terms of what
- 19 her issues were with Garvin?
- 20 A. Mostly, I think just in general there was an issue
- 21 with the e-mails that Lieutenant Garvin would send out.
- He would send out quite a few. You know, basically,
- 23 providing expectations and directions on things. In this
- 24 specific instance, it had to do with the station fund report.
- 25 Lieutenant Garvin was reviewing the station fund reports for

- 1 Bomb K9, and Laurie Harrington was a station fund committee
- 2 member, and she was really responsible for the checkbook and
- 3 doing the disbursements and gathering the receipts and so
- 4 forth.
- 5 And they're required to put together these monthly
- 6 reports for the station fund. We have to track everything
- 7 that we do, everything that we disperse, everything that
- 8 comes in, and we have to submit these reports to the
- 9 commanding officer monthly. That's a requirement for the
- 10 station fund.
- 11 Q. Is that like an expense report --
- 12 A. Basically, yes. It's a monthly expense report.
- 13 Q. Is it done on Excel or --
- 14 A. No. There is a LAPD form for it, and it's filled
- out each month, and it gets submitted to the commanding
- 16 officer of the division, and they review it, sign it, and
- 17 then we retain copies of everything.
- So it includes bank statements, any receipts, and so
- 19 forth.
- 20 O. What is a station fund?
- 21 A. Station fund is set up based in a unit or unit
- 22 division. It's basically a fund that can be used for a
- 23 variety of things where oftentimes officers may submit dues.
- 24 They may pay dues to build up the balance, and they will use
- 25 the station fund for plaques for retirement, special

It could be for sending flowers, you know, when 1 luncheons. 2 there is a funeral service for an officer, for someone in 3 their family. Primary, that's what we use it for in Bomb K9, 4 is we send flowers or things like that or somebody's off 5 injured, we might send them some flowers or something. 6 So it's basically a fund and, it's, you know, we can 7 sell merchandise to build up that fund. Some stations do snack bars where they have, you know, have a never-ending 8 9 snacks that build up their station funds. We don't do snacks 10 where we're at. But Laurie -- there was -- back at that time there 11 12 was probably three or four committee members that are on the 13 station fund, and Garvin had sent an e-mail out to them 14 indicating because they weren't keeping up on the receipts. 15 They weren't having paper receipts to accommodate the transactions that they were reporting. And his e-mail had 16 17 addressed that, you know, they needed to make sure that they 18 had the receipts, but he went on to state in there that, you 19 know, officers have been arrested for misappropriation of funds, and you know -- and the idea -- I know that he was 20 21 just trying to make sure that they abide by the rules and had 22 adequate tracking and that it's very important dealing with 23 money; that that was important. 24 But I think his delivery in the e-mail had no 25 personality to it whatsoever, and I think it was offensive

- 1 because they felt like, oh, like, I'm not doing anything
- 2 wrong, you know, and there might have been a better way of
- 3 explaining that. But at the time she did not want to be a
- 4 part of the station. She wanted to just give the station
- 5 fund up at that point because that was one of her
- 6 contentions, is that she didn't want to deal with Lieutenant
- 7 Garvin and his many e-mails, and that she felt -- I think she
- 8 felt offended by it.
- 9 And so and she had just relayed this as like similar
- 10 to what I think that he's done in the time that he's been
- 11 there, that his e-mails can be a little abrasive and maybe
- 12 rub people the wrong way. And so in this instance, I had
- 13 said, "Well, what if I handle the station fund, how about you
- 14 guys deal with me, and we'll move forward, and we'll continue
- 15 the station fund. I'll talk to Lieutenant Garvin, and I'll
- do the reports, and I'll complete them." Because he would do
- 17 the reports at the end of the month. I'm pretty sure he did
- 18 them all. So ultimately, Garvin approved that. He said,
- 19 "Yeah. No problem. Have it and go ahead."
- 20 And I have been doing it ever since.
- 21 So now I just deal with the officers on that.
- 22 O. Now, you had said -- made a comment that some of the
- 23 e-mails that Garvin sent out to the unit -- I'm assuming to
- 24 the unit, were somewhat abrasive?
- 25 A. Yes.

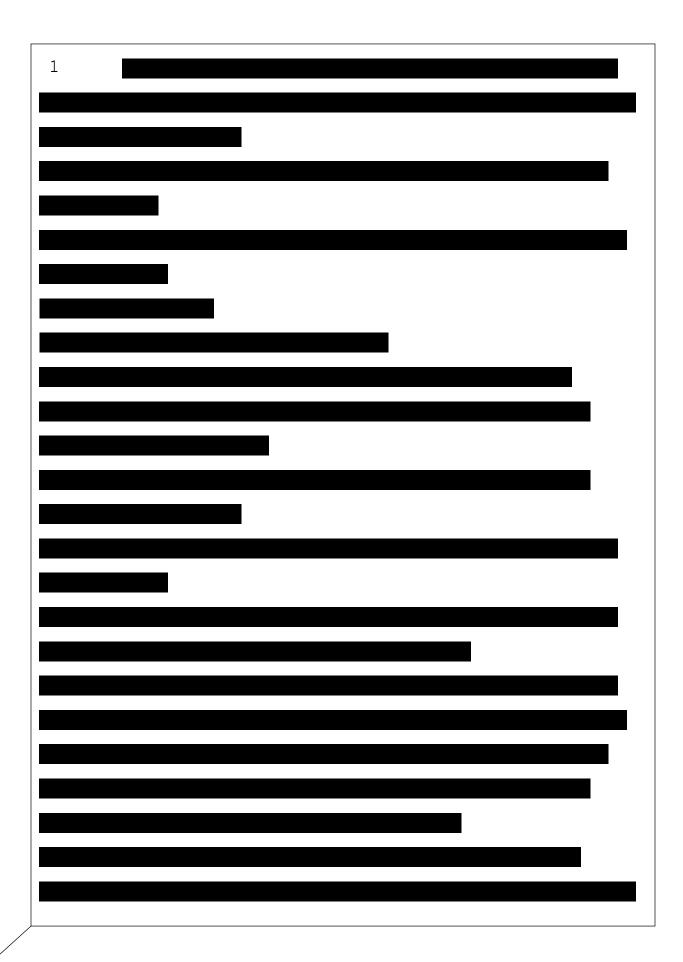
- 1 Q. Are you saying you found them to be abrasive or that
- 2 other officers within the unit had told you that they found
- 3 them to be abrasive or both?
- 4 A. I don't think they used the word "abrasive."
- 5 I'm just describing them from what I could see, but
- 6 I know that handlers had reported over time that they did not
- 7 like the way the e-mails came out. And there were some that,
- 8 you know, that I saw too, that you know, I might have worded
- 9 them a little different, you know, but you know, each person
- 10 has a different way of delivering messages, and that was his
- 11 style.
- 12 Q. When you came into the unit in -- did you say
- 13 October, 2015?
- 14 A. Yes.
- 15 O. Did you see anything that lead you to believe that
- 16 the unit was suffering from low morale as a result of those
- 17 e-mails, communications, that Garvin had been sending out?
- 18 MR. KONG: Objection. Speculation. Foundation.
- 19 You can answer if you know.
- 20 THE WITNESS: I wouldn't know about the morale.
- I mean, it didn't appear to me that morale was
- 22 affected by it; just that people had some heart burn with it,
- 23 you know. They didn't care for it as much.
- 24 BY MR. SALUTE:
- 25 O. And this issue that came up with Harrington and the

station fund, when was that? 1 2 Do you recall? 3 Α. Shortly after I got there. 4 I don't recall the exact month, but it probably was 5 within six months of me getting there. 6 Is that around when you took over the station 7 fund? 8 Α. Yes. 9 And after you took over the station fund, did Garvin 0. 10 send out any other e-mails regarding that issue? 11 Α. No. 12 Did Harrington complain to you after that one time 0. 13 about the station fund that she was offended by any other 14 e-mails that Garvin had sent out? 15 Not that I recall. Α. 16 0. And when we're talking about that she was offended 17 by the e-mail, are we -- we're just talking about the fact 18 that she found it to be somewhat abrasive? Is that what we're talking about? 19 20 I would call it abrasive. I don't know if she would Α. 21 use the same verbiage. I think her response to me made me 22 feel that she was offended by it because he had indicated, 23 you know, that people had been in trouble for, you know, 24 misappropriating funds, and I think she felt that either he 25 was referencing that -- suggesting that they were doing that,

- 1 or -- and I think that him adding that in there, that extra
- 2 part, made her feel probably defensive about it.
- 3 But she didn't use those specific words. She just
- 4 was not happy that it said that, and she said, "I'm done with
- 5 the station fund then. I'm not going to do it. We won't
- 6 have one."
- 7 And that's when I talked to her about okay, well,
- 8 why don't we just see if I could review the reports. He --
- 9 you know, and I did explain he has an obligation to make sure
- 10 that stuff is tracked appropriately. That is true, you know.
- 11 And I know that he was probably trying to educate them that
- 12 these are the severe things that can happen in this. We're
- dealing with money, and you know, these can't happen,
- 14 problems in the department in the past.
- 15 Did he have to use that part? Probably not.
- 16 He probably could have communicated it a little bit
- 17 without throwing that in there, but I think that was his
- 18 opinion.
- I don't know for sure, but -- so.
- 20 Q. Okay. And now, were you on that e-mail chain, or
- 21 she just communicated to you what was said in the e-mail?
- A. No. I saw the e-mail, but I don't remember.
- I believe I was on the e-mail chain. I can't
- 24 remember if she just gave it to me or if I was actually
- 25 received it as well.

- 1 Q. Do you recall who the e-mail was sent to?
- 2 A. I don't know if it was to the entire unit or just to
- 3 the committee, to the station fund committee.
- 4 Q. But it was your belief that she was conveying to you
- 5 that she felt somewhat offended by the comment in the e-mail
- 6 because she felt it accusatory; is that fair to say?
- 7 A. Yeah. I think that's the way she probably took
- 8 it.
- 9 Q. And when you read the e-mail did you believe there
- 10 was anything offensive in the e-mail, per se?
- 11 A. I don't think he was being accusatory. I didn't see
- 12 it that way, but I didn't see the need to -- I think the
- 13 delivery part of it, it's -- you know, when you just -- you
- 14 could have said, you know, it's important to track these
- 15 things because people have had some issues in the past and
- 16 better accounting helps us protect ourselves. That could be
- 17 the same way as what he was trying to say of people have
- 18 been -- officers have been arrested for not appropriately
- 19 tracking money, you know. You're basically saying the same
- 20 thing, but one is a little bit easier to digest and maybe not
- 21 quite as, like, oh, you know, it's like, I can understand
- 22 that.
- 23 So I think that's really what the difference was.
- I think he was just trying to put out the correct
- 25 information. It's important. But I think the way that the

- 1 e-mail read, I could see where that part probably didn't need
- 2 to be in there, or it could have been communicated a little
- 3 bit softer in the sense of where it didn't come out sounding
- 4 like they may feel accused of not tracking things
- 5 appropriately --
- 6 Q. Did you ever talk to Garvin about how Harrington
- 7 felt about that e-mail?
- 8 A. No. I just asked him if he would not mind if I
- 9 would just handle the station fund from --
- 10 Q. Do you know -- sorry.
- 11 Do you know whether she talked to Garvin about how
- 12 she felt about receiving that e-mail?
- 13 A. I don't know if she did or not.
- 0. So you don't know if Garvin was saying what he said
- in the e-mail as a way of possibly protecting her as well?
- 16 In other words, so that she wouldn't be accused of
- 17 this later on if you provide the reports in a timely
- 18 manner?
- 19 MR. KONG: Objection. Speculation. Foundation.
- 20 MR. SALUTE: That's true. I'll withdraw that.
- 21 Why don't we take a five-minute break.
- 22 Okay?
- 23 (Recess taken.)
- MR. SALUTE: We're back on the record.
- 25 BY MR. SALUTE:

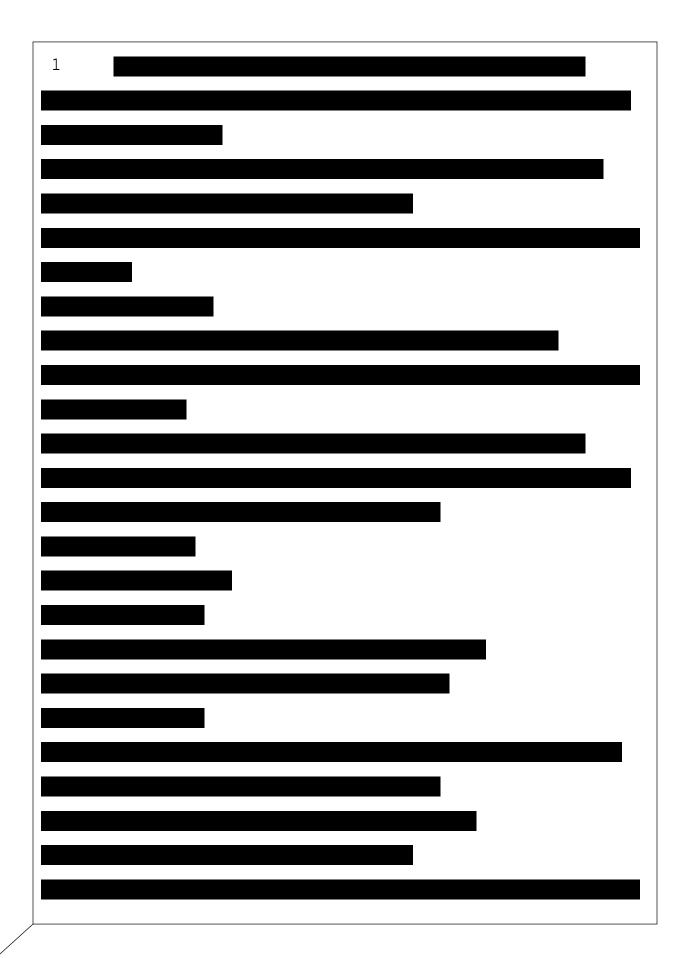


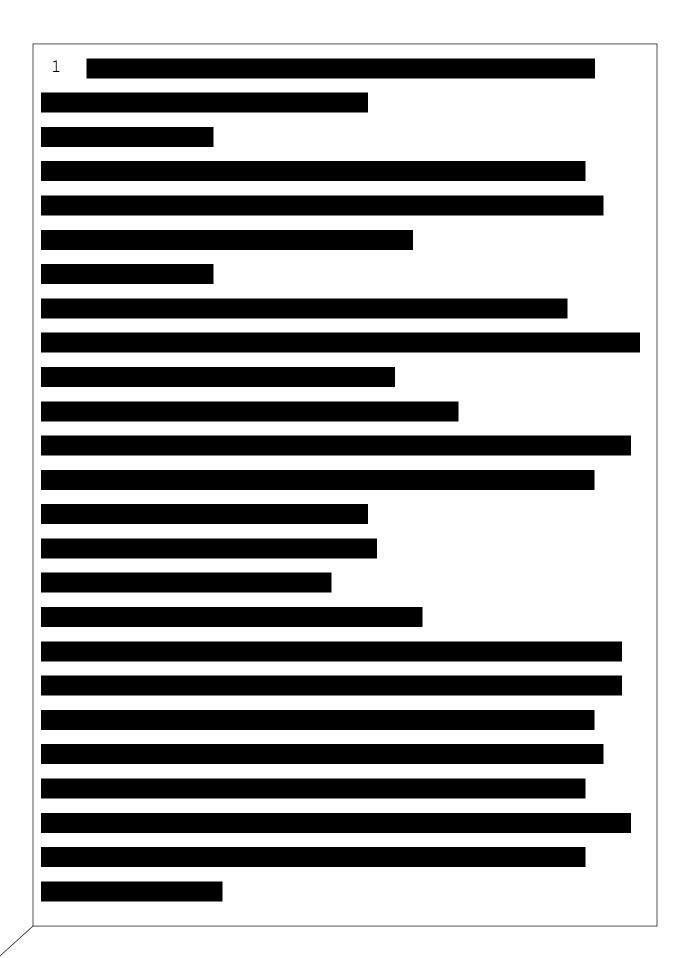
20 BY MR. SALUTE: Okay. Fair enough. 21 Q. 22 Then that will cut this short. So let me see if there is anything else before we 23 conclude for today. 24 25 I know what was I going to ask you.

- 1 Now, at some point a trainer position was -- became
- 2 available within the Bomb Detection K9 Unit in or about early
- 3 to mid 2016.
- 4 Do you recall that?
- 5 A. Yes.
- 6 O. And were you involved in the selection of the new
- 7 trainer?
- 8 A. Yes.
- 9 Q. And what was your involvement in that?
- 10 A. I sat on the interview, oral interview board, and
- 11 provided my insight and opinion onto the selection of the
- 12 trainer to the OIC, Lieutenant Garvin.
- 13 Q. As I understand it, Sergeant Goens was one of the
- 14 other individuals that sat on the interview board?
- 15 A. Yes.
- 16 O. And -- well, let me ask it this way.
- Was it just the three of you?
- 18 You, Goens, and Garvin?
- 19 A. It was the three of us on one day. It went over
- 20 several days or couple days, and then the board got mixed.
- I was there -- oh, no. For the trainers, yes.
- I'm sorry. I was getting confused because we also
- 23 had a handlers selection.
- Yes. It was just the three of us for the trainer
- 25 position, yes.

And do you recall how many individuals interviewed 1 for that trainer position in 2016? 3 Α. Yes. How many? 4 Q. 5 Α. Three. And one of them was Ara Hollenbeck? 6 Q. 7 Α. Yes. Q.

- 3 BY MR. SALUTE:
- 4 Q. Okay. Sergeant Stark, you have been with LAPD for
- 5 how long?
- 6 A. 27 years, almost 28 this summer.
- 7 Q. And are you familiar with what a team's report is?
- 8 A. Yes.
- 9 Q. And what is a team's report?
- 10 A. It's a report that is compiled of your entire work
- 11 history with the department that includes assignments, rank
- 12 and pay grades that you've -- accommodations, complaints,
- 13 pursuits that you have been involved in, use of forces,
- 14 outside employment permits. It's a compilation of a lot of
- 15 items pertaining to your own personal work history.
- Q. And are jobs that officers have applied and
- interviewed for, are those listed on a team's report?
- 18 A. Not applied for, no.
- 19 Only that they held.
- Q. Just positions that they have held; correct?
- 21 A. Yes.
- 22 O. And so that information regarding jobs that they
- 23 have applied and interviewed for is, just to be clear, is not
- 24 contained on a team's report; right?
- 25 A. That's correct.





1 2 BY MR. SALUTE: 3 Okay. Is it fair to say that at some point there 0. 4 was some agreement between you and Garvin and Goens about who would be selected for the trainer position in 2016? 5 6 MR. KONG: Objection. Vague. Foundation. 7 You can answer if you understand the question. 8 THE WITNESS: Yes. 9 BY MR. SALUTE: Okay. Well, after the interview process was there 10 11 some kind of a roundtable discussion about the applicants for 12 the position? 13 Α. Yes. 14 And did you come to some kind of consensus as to who 15 the three of you felt was the best candidate for the position? 16 17 Α. Yes. 18 And who was selected for the trainer position? 0. Ara Hollenbeck. 19 Α. And after Hollenbeck was selected, did you hear from 20 Q. 21 anybody about the selection in terms of that they did not 22 agree with the selection? 23 MR. KONG: Objection. Vaque. To the extent -- I'm just going to advise that the 24

witness not to disclose the names of any applicants or

25

1 candidates. 2 So just offering that with the instruction based 3 on -- instructing to respond. 4 THE WITNESS: After the selection was made, I did 5 not hear anybody come to me directly to say that they had 6 issues. 7 BY MR. SALUTE: 8 Ο. Did Sauvao, Mark Sauvao, he was one of the trainers in 2016? 9 10 Α. Yes. 11 0. In fact, he was -- there were two trainers at the 12 time; right? 13 Α. Yes. And then one left --14 Q. Right --15 -- so vacated a position. Α. 16 Right. So Hollenbeck took the vacated position; 0. 17 right? 18 Α. Yes. 19 0. And who was the person that was in that position 20 before I forget? 21 Α. Melhoq. 22 That's right. So at the time that the position 0. 23 became vacated, Melhog left, and Sauvao was the other

24

25

trainer; right?

Yes.

Α.

- 1 Q. And then Hollenbeck filled the vacant spot, and then
- 2 it just became Sauvao and Hollenbeck as the trainers;
- 3 right?
- 4 A. Yes.
- 5 Q. And did Sauvao ever express to you that he disagreed
- 6 with the selection of Hollenbeck as the other trainer?
- 7 A. Not after the selection. Prior to the selection.
- 8 O. Okay. When did that occur?
- 9 A. Maybe a couple weeks or so before the selection was
- 10 being made.
- 11 Q. And what did he say?
- MR. KONG: Again, just going to warn the witness not
- 13 to disclose any identities of potential applicants or any
- 14 information having to do with any of the Pitchess records.
- Go ahead.
- 16 BY MR. SALUTE:
- 17 Q. Well, hold on a second before you get there.
- 18 At the time that Mark Sauvao started talking to you
- 19 about -- well, did he start talking to you about who he
- 20 believe should be selected for the vacant trainer position?
- 21 A. I asked him his opinion.
- 22 O. At the time that you asked him his opinion, had
- 23 people applied for that position yet?
- 24 A. I believe so.
- O. Okay. So this was after the position had been

published and put out for selection process? 1 2 Α. Yes. 3 0. Fair enough. So okay. 4 Then what did he express to you about who -- well, 5 let me withdraw that. 6 What did he express to you about the trainer 7 position? MR. KONG: Objection. Vaque. 8 9 You can answer if you understand. 10 THE WITNESS: It was very short. I just asked him 11 his opinion on who he feels would be an appropriate or would 12 be a good candidate, and he replied with somebody. 13 And that was basically it. 14 BY MR. SALUTE: 15 Okay. After Hollenbeck was selected for the 0. 16 position, did he express to you any kind of disappointment in the fact that Hollenbeck had been selected instead of others 17 18 that he felt might be more appropriate? 19 Α. Not to me, no. 20 Q. Did you hear from anybody else that he had expressed 21 his disappointment about the selection? 22 Α. Yes. 23 Who did you hear it from? 0. 24 Α. Captain Meek.

What did she say?

25

0.

- 1 A. She had indicated that he had called her and had
- 2 said that he was not -- I don't know the exact words, but
- 3 obviously, wasn't pleased with the selection or didn't agree
- 4 with the selection.
- 5 Q. Say he was angry about it?
- 6 A. I don't know.
- 7 Q. So just so I understand -- well, let me ask it this
- 8 way.
- 9 How did -- how was it communicated from Meek that
- 10 Sauvao was disappointed or upset in some way about the
- 11 selection of the trainer?
- 12 She called you?
- 13 A. No. It was -- I believe it was that she was on
- 14 speaker phone with myself and Lieutenant Garvin relating to
- 15 another matter and it came up that she said that he had
- 16 called her after the selection to express his opinion about
- 17 it.
- 18 O. Were you surprised to hear that?
- 19 A. Yes.
- Q. Why was that?
- 21 A. Just to call the captain directly and not come to
- 22 the -- at least to myself or Lieutenant Garvin, and I'm
- 23 assuming that that did not occur.
- It was a little weird to me.
- 25 O. Because he sort of circumvented the chain of

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1
     commands?
 2
         Α.
              Yes.
              In fact, he went up -- what is that -- three
 3
         Q.
 4
     levels?
5
         Α.
              Two.
6
              Two?
         Q.
 7
         Α.
              Yeah.
 8
19
              So here is what I'm going to do.
20
              I'm sorry to have to do this, but we're going to
     suspend the deposition for now. I'm going to have to file a
21
22
     Pitchess motion. We're going to have to bring you back to
     answer some questions related to the documents, if any, that
23
     I receive, and we'll go from there.
24
25
              THE WITNESS:
                            Okay.
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1	MR. SALUTE: So you want to do the same stip as
2	yesterday?
3	MR. KONG: That's fine.
4	MR. SALUTE: Okay. So same stip.
5	(Deposition proceeding concluded at 11:32 a.m.)
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DECLARATION UNDER PENALTY OF PERJURY
Case Name: Raymond Garvin vs. City of Los Angeles
Date of Deposition: June 27, 2019
Job No.: 248883
I,, hereby certify
under penalty of perjury under the laws of the State of
California that the foregoing is true and correct.
Executed this,
20, at, California.
DEANA STARK